

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
(Eastern Division)

CHARLES C. JOHNSON and	:	
GOT NEWS, LLC	:	
	:	Case No. 14:15-cv-01137
Plaintiffs,	:	
	:	
	:	
GAWKER MEDIA, LLC, J.K. TROTTER,	:	
and GREG HOWARD	:	
	:	
Defendants.	:	
	:	
	:	

DECLARATION OF GREGORY HOWARD

I, GREGORY HOWARD, declare as follows:

1. I am a defendant in this matter. I am competent to testify as to the facts set forth below, and, if called as a witness, could and would testify to such facts based on personal knowledge and under oath.

2. At all times relevant to this lawsuit, I was a staff writer at Gawker Media, LLC, a defendant in this action.

3. I am a domiciliary of the State of New York and live and work in New York City, New York.

4. As pertinent to this matter, I wrote one article published to Gawker Media, LLC's website, Deadspin, on December 9, 2014 and related to Charles C. Johnson.

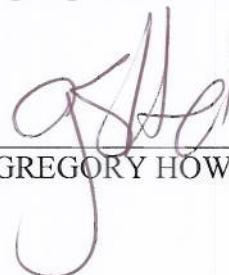
5. That article is titled "Wait, Did Clowntroll Blogger Chuck Johnson Shit On The Floor One Time?" and available at <http://theconcourse.deadspin.com/wait-did-clowntroll-blogger-chuck-johnson-shit-on-the-1668919746>.

6. In reporting the article, I did have contact with Johnson, who I understood to be in California when I contacted him. To the best of my knowledge, none of the sources I used in reporting the article lived in Missouri nor did I travel to Missouri in the process of my reporting.

7. I do not own any real or personal property located in Missouri. I also do not maintain a bank account in Missouri. Additionally, I have never voted or been registered to vote in Missouri and have never been employed in Missouri.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/20/15



GREGORY HOWARD

CERTIFICATE OF SERVICE

The undersigned certifies that on this 24th day of August, 2015, a true copy hereof was served with the Clerk of the Court using the CM/ECF system on the following:

Jonathon Christian Burns
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Attorneys for Plaintiffs

By: /s/ Joseph E. Martineau